

From: Mark Leymaster <RenSoft@cpcug.org> on 10/26/2004 11:50:30 AM

Subject: Electronic Fund Transfers

Federal Reserve System
20th and Constitution Ave., N.W.
Washington, DC 20551

Re: Docket No. R-1210

Dear Ms. Johnson,

As a long time observer of electronic banking and the poor, I strongly support the proposed amendment to federal Regulation E which addresses payroll cards. Your amendment would correctly treat an employer sponsored payroll card as an account which receives the consumer protections of the federal Electronic Fund Transfer Act. Additionally, the Board could solve many closely related problems if it were to extend this same clarity to other types of stored value cards that are imposed upon or marketed to consumer households.

I appreciate your attention to critical features such as:

- (1) Your proposal applies to payroll cards issued by financial institutions, employers, and other entities;
 - (2) It includes all of the EFTA protections, including periodic statements;
 - (3) It covers all the funds in the payroll card account; and
 - (4) It covers recurring employee compensation whether wages, salary, a bonus or commission.
- Well done.

I urge the Board to apply this provision to prevent analogous abuses in

- (1) so called "child support cards" card-based delivery of tax refunds or tax refund anticipation loan proceeds; and
- (2) Cards marketed as substitutes for a bank account, such as direct deposits of as social security payments and other pensions.

It would be well for the Board to articulate that this amendment does not restrict other "consumer asset accounts" covered by the EFTA, and that the general rules of Regulation E which will continue to apply to other products after the adoption of special inclusive rules for certain kinds of cards.

Very truly yours,

Mark Leymaster
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